

From: Beeler, Cindy
Sent: Wednesday, July 17, 2019 07:42 PM
To: Mia, Marcia
CC: Ostrand, Laurie
Subject: RE: Subpart 0000a questions

60.19(c) Notwithstanding time periods or postmark deadlines specified in this part for the submittal of information to the Administrator by an owner or operator, or the review of such information by the Administrator, such time periods or deadlines may be changed by mutual agreement between the owner or operator and the Administrator. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.

Cindy Beeler
US EPA Region 8
Tel: 303-312-6204
Beeler.Cindy@epa.gov
Green Dot

CONFIDENTIALITY NOTICE: This e-mail, including all attachments, is for the sole use of the intended recipients and may contain Confidential and privileged information. Any unauthorized use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender and destroy all copies of this message.

From: Mia, Marcia
Sent: Wednesday, July 17, 2019 1:35 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Subject: FW: Subpart 0000a questions

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments.

From: Mia, Marcia
Sent: Wednesday, July 17, 2019 10:24 AM
To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Subject: RE: Subpart 0000a questions

Ex. 5 Deliberative Process (DP)

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

This message may contain deliberative, attorney-client or otherwise privileged material. Do not release this message without the appropriate review. If you are not the intended recipient, kindly advise and delete this message/attachments.

From: Ostrand, Laurie
Sent: Wednesday, July 17, 2019 10:02 AM
To: Mia, Marcia <Mia.Marcia@epa.gov>
Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>
Subject: FW: Subpart 0000a questions

Hi Marcia

Thought I'd check with you before responding to this question:

Do you know where it's required that LDAR semiannual reports need to be submitted w/in 30 days after the end of the reporting period? Karen and I can't seem to find a specific requirement in the regs?

Ex. 5 Deliberative Process (DP)

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Marsh, Karen

Sent: Wednesday, July 17, 2019 7:13 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: RE: Subpart 0000a questions

Ex. 5 Deliberative Process (DP)

VVa states they have to submit semiannual reports beginning 6 months after the initial startup date. 60.487a(a).

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Ostrand, Laurie

Sent: Tuesday, July 16, 2019 2:20 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Subpart 0000a questions

Thanks Karen

Do you know where it's required that semiannual reports need to be submitted w/in 30 days after the end of the reporting period? I'm not finding it in the regs?

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Marsh, Karen

Sent: Tuesday, July 16, 2019 11:21 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: RE: Subpart 0000a questions

Ex. 5 Deliberative Process (DP)

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Ostrand, Laurie

Sent: Tuesday, July 16, 2019 1:14 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Subpart 0000a questions

Ex. 5 Deliberative Process (DP)

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Marsh, Karen

Sent: Tuesday, July 16, 2019 11:12 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: RE: Subpart 0000a questions

To answer his AWP question...

Ex. 5 Deliberative Process (DP)

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: Ostrand, Laurie

Sent: Tuesday, July 16, 2019 12:50 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: FW: Subpart 0000a questions

Hi Karen

Ex. 5 Deliberative Process (DP)

Thanks

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Chad Powell <cpowell@ltenv.com>

Sent: Tuesday, July 16, 2019 10:21 AM

To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Cc: Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>;
Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Subject: RE: Subpart 0000a questions

Thanks, Laurie. I appreciate everyone coordinating these efforts.

Regarding the semiannual report, what is the due date? In this specific example, we have a gas processing plant that started operations on April 1st, 2019. Six months would put the end of the semiannual period at September 30th. When is the report due? October 30th? End of year? I can't find anything in the rule to indicate when the report must be submitted. Please clarify.

For the OGI question, it would appear that an onshore natural gas processing plant subject to Subpart OOOOa cannot use the current AWP since it must comply with the no detectable emissions standard. Therefore, an operator must use M21 only to conduct their inspections on a monthly basis. Correct?

Thanks,

Chad Powell

Senior Air Quality Scientist

303.962.5555 direct

720.284.8681 cell

From: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Sent: Tuesday, July 16, 2019 9:57 AM

To: Chad Powell <cpowell@ltenv.com>

Cc: Beeler, Cindy <Beeler.Cindy@epa.gov>; North, Alexis <North.Alexis@epa.gov>; Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Wilwerding, Joseph <Wilwerding.Joseph@epa.gov>

Subject: FW: Subpart OOOOa questions

Hi Chad

Cindy requested that I respond to your OOOOa gas processing plant LDAR monitoring questions. See below.

OGI question:

The EPA has promulgated an alternative monitoring method, termed the alternative work practices (AWP), to Method 21 (M21). The current AWP is contained in 40 C.F.R. §§ 60.18(g), (h), and (i), 63.11(c), (d), and (e), and 65.7(e), (f), and (g). The EPA does not require facilities that opt into the current AWP to obtain EPA approval so long as you adopt the AWP as written in §§ 60.18(g), (h), and (i), 63.11(c), (d), and (e), or 65.7(e), (f), and (g).

Among other things, the current AWP requires: (1) OGI monitoring monthly, bimonthly, or semi quarterly - depending on the g/hr threshold that is selected; (2) replacing one of

those OGI events with M21 monitoring each year; (3) keeping video records of the entire OGI survey; and (4) submitting the annual M21 records to ccg-awp@epa.gov. Also, the current AWP excludes the use of the OGI for closed vent systems, equipment designated as leakless, and equipment identified in the applicable subpart as having no detectable emissions, as indicated by an instrument reading of less than 500 ppm above background. The AWP, at §§ 60.18(h)(2), 63.11(d)(2), and 65.7(f)(2), requires that any leak identified using the OGI camera must be repaired. Since the OGI camera can detect methane, ethane, etc., for the purpose of the AWP the instrument used for the annual M21 monitoring, or to confirm that a leak was repaired, must also be able to detect the same compounds as the OGI camera.

Semiannual report question:

40 C.F.R. § 60.5422a, What are my additional reporting requirements for my affected facility subject to GHG and VOC requirements for onshore natural gas processing plants?, requires that initial and semiannual reports 0000a reports be submitted to the EPA via the Compliance and Emissions Data Reporting Interface (CEDRI).

40 C.F.R. §60.487a, Reporting requirements, indicates:

Each owner or operator subject to the provisions of this subpart shall submit semiannual reports to the Administrator beginning 6 months after the initial startup date.

Also, 40 C.F.R. § 60.19, General notification and reporting requirements, indicates:

(d) If an owner or operator of an affected facility in a State with delegated authority is required to submit periodic reports under this part to the State, and if the State has an established timeline for the submission of periodic reports that is consistent with the reporting frequency(ies) specified for such facility under this part, the owner or operator may change the dates by which periodic reports under this part shall be submitted (without changing the frequency of reporting) to be consistent with the State's schedule by mutual agreement between the owner or operator and the State. The allowance in the previous sentence applies in each State beginning 1 year after the affected facility is required to be in compliance with the applicable subpart in this part. Procedures governing the implementation of this provision are specified in paragraph (f) of this section.

That being said, the majority of natural gas processing plant LDAR semiannual reports that I see are submitted in January (for the semiannual period from 7/1 to 12/31) and in July (for the semiannual period from 1/1 to 6/30).

Laurie Ostrand

U.S. Environmental Protection Agency

8ENF-AT

1595 Wynkoop Street

Denver, Colorado 80202

303-312-6437

From: Chad Powell <cpowell@ltenv.com>

Sent: Monday, July 15, 2019 3:58 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: RE: Subpart OOOOa questions

Hi Cindy,

I hope you had a great weekend and have made progress on your deadlines. I have an additional question for you regarding Subpart OOOOa. I'm going to add it to the list and when possible, can you answer all 3 questions? The additional question is:

Onshore natural gas processing plants subject to Subpart OOOOa require Method 21 monitoring (cross-referenced with Subpart VVa). Are operators allowed to use Method 21 annually (i.e. once per year) and use OGI cameras to conduct their inspections the other 11 months as an alternative means of compliance with the regulation? Based on Section 60.18(g), I don't think this is allowed. But my interpretation may be off.

Thanks,

Chad Powell

Senior Air Quality Scientist

303.962.5555 direct

720.284.8681 cell

From: Beeler, Cindy <Beeler.Cindy@epa.gov> M
To: Chad Powell <cpowell@ltenv.com>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: RE: Subpart OOOOa questions

Chad - I am in the middle of some pressing work with deadlines - I will look into your questions soon and get back to you.

Cindy Beeler

US EPA Region 8

Tel: 303-312-6204

Beeler.Cindy@epa.gov

Green Dot

CONFIDENTIALITY NOTICE: This e-mail, including all attachments, is for the sole use of the intended recipients and may contain Confidential and privileged information. Any unauthorized use, disclosure or distribution is prohibited. If you are not the intended

recipient, please contact the sender and destroy all copies of this message.

From: Chad Powell <cpowell@ltenv.com>
Sent: Tuesday, July 9, 2019 1:19 PM
To: Beeler, Cindy <Beeler.Cindy@epa.gov>
Cc: North, Alexis <North.Alexis@epa.gov>
Subject: Subpart 0000a questions

Hi Cindy,

Alexis asked that I reach out to you regarding a couple Subpart 0000a questions. Here we go:

I couldn't find a due date for Subpart 0000a semi-annual reports for onshore natural gas processing plants. While the regulation stipulates semi-annual reporting, I don't see whether the report is due within 30 days of the end of the period or some other timeframe. Can you please clarify this?

Under the upstream production segment, a 2-hour Method 22 test is required when initially evaluating the flare/combustor. Subsequent testing should be performed monthly but for 15 minutes (instead of 2-hours). However, Section 60.5412a(a)(3) requires that a flare be designed and operated to comply with Section 60.18(b). Section 60.18(f)(1) requires 2-hour Method 22s each time. Does this conflict? Does one part of the regulation take precedent over the other? Please clarify.

If you have any questions for me, please let me know.

Thanks,

cid:image002.png@01D4A347.0FF4E460

Chad Powell

Senior Air Quality Scientist

303.962.5555 direct

720.284.8681 cell

4600 West 60th Avenue Arvada, CO 80003

www.ltenv.com

cid:image012.png@01D4A440.67CFA270cid:image013.png@01D4A440.67CFA270
cid:image014.png@01D4A440.67CFA270 cid:image010.jpg@01D4A347.0FF4E460Think before you
print. Click for our email disclosure.

